

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WNI 16-017621
Shapiro & DeNardo, LLC
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IN RE:

TARA L. LYONS A/K/A TARA L. SHEEHAN,
DEBTOR



Order Filed on June 25, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

CASE NO.: 19-17259-JKS

JUDGE: HONORABLE JOHN K.
SHERWOOD

CHAPTER: 13

CONSENT ORDER RESOLVING MOTION TO VACATE STAY

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

DATED: June 25, 2020

A handwritten signature in black ink, appearing to read "J K Sherwood".

Honorable John K. Sherwood
United States Bankruptcy Court

This matter being opened to the Court by Shapiro & DeNardo, LLC, Attorneys for Wells Fargo Bank, N.A., hereinafter "Secured Creditor", upon the filing of a Notice of Motion for an Order Vacating Stay in a Chapter 13 Case for failure of the Debtor to make post-petition payments on a mortgage obligation, and due notice of said Motion and the supporting Certification having been given by mail to the Trustee, the Debtor and the attorney for the Debtor, if any AND CONSENT OF THE PARTIES APPEARING HEREON and for good cause shown,

1. Debtor is currently delinquent in post-petition payments for the months of February 1, 2020 through June 1, 2020, in the total amount of \$17,069.43.
2. To cure the delinquency outlined in paragraph one (1) above, Debtor agrees to remit \$17,069.43 within ten (10) days of entry of this Order.
3. Starting July 1, 2020, Debtor also agrees to maintain all contractually due payments, which currently are in the amount of \$3,483.75 per month.
4. Payments should be submitted to the Secured Creditor via Certified Check to the below address:

Wells Fargo Home Mortgage
PO Box 14507
Des Moines, IA 50306


5. If the Debtor(s) fails to make any payments detailed in this Consent Order within thirty (30) days of the date the payments are due, or if any of the funds paid fail to clear for insufficient funds or are dishonored for any reason, then the Secured Creditor may send Debtor and Debtor's Counsel a written notice of default of this Consent Order. If the default is not cured within ten (10) days of such notice, Mortgagee may obtain an Order Vacating the Automatic Stay as to the Collateral by submitting a Certification of Default to the Bankruptcy Court, specifying the Debtor(s) failure to comply with this Consent Order, with a copy of any application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor(s) Counsel and Debtor(s) as required by the local bankruptcy rules.

We hereby consent to the form, content,
and entry of the within Order.

Shapiro & DeNardo, LLC

/s/Elizabeth L. Wassall

Elizabeth L. Wassall, Esquire
Attorney for the Secured Creditor


Todd S. Cushner, Esquire
Attorney for the Debtor

Date: 6-4-2020

Date: 6/3/20